

### REMARKS

Reconsideration of this application in view of the following remarks is respectfully requested.

#### Extension of Time

This Reply is accompanied by a Petition for An Extension of Time. In accordance with the Petition, the due date for responding to the November 23, 2004 Office Action is extended to April 23, 2005.

#### Power of Attorney and New Correspondence Address

This Reply is accompanied by a Power of Attorney and Correspondence Address Indication Form. Use of the new correspondence address for future communications is respectfully requested.

#### Claims 1-14

This Reply is in response to the November 23, 2004 Office Action on the above-identified patent application. In the November 23, 2004 Office Action, claims 1, 3, 4, and 9-12 were rejected under 35 U.S.C. §102(e) as being anticipated by Gopinathan et al. U.S. Patent No. 5,819,226. Claim 2 was rejected under 35 U.S.C. §103(a) as being unpatentable over Gopinathan. Claims 5, 6, 8, 13, and 14 were rejected under 35

U.S.C. §103(a) as being unpatentable over Gopinathan in view of Agrafiotis et al. U.S. Patent No. 6,453,246 B1. Under the "Disposition of Claims" section in the Office Action Summary, claim 7 is said to be rejected, but no grounds of rejection were contained in the Office Action. The rejections of claims 1-14 are respectfully traversed.

Applicant's invention relates to the detection and prevention of electronic fraud. One aspect of applicant's invention relates to the use of multiple sub-modules for detecting fraud. The different sub-modules implement different intelligent fraud detection technologies. One sub-module uses neural network technology and another sub-module uses rule-based reasoning technology. Additional sub-modules use data mining technology and case-based reasoning technology. By combining these intelligent technologies, the invention provides much more accurate predictions of fraud than possible with conventional approaches.

Claim 1 has been amended to make it clearer that the fraud detection and prevention model software component includes sub-modules for neural network technology, rule-based reasoning technology, data mining technology, and case-based reasoning technology. The features of claim 1 are not shown or suggested by the prior art.

The Gopinathan patent is directed to fraud prevention using a conventional neural network approach. As shown in FIG. 8 of Gopinathan, neural network model 108 receives input data and produces results. The process of using Gopinathan's neural network is shown in FIG. 7 of Gopinathan and is described at column 4, lines 31-42. Gopinathan's approach does not involve the use of sub-modules for neural network technology, rule-based reasoning technology, data mining technology, and case-based reasoning technology as required by claim 1.

Claim 1 is directed to a method for detecting and preventing electronic fraud using a model software component that includes sub-modules for neural network technology, rule-based reasoning technology, data mining technology, and case-based reasoning technology. Gopinathan uses a different approach based on a conventional neural network model. Claim 1 is not therefore not anticipated by Gopinathan and is in condition for allowance. Claims 2, 3, and 5-14 depend from claim 1 and are allowable because claim 1 is allowable. Claim 4 has been canceled.

#### Claims 15-89

Claims 15-89 have been canceled.

New Claim 90

Claim 90 has been added to further define how the model training interface is used to select which sub-models are incorporated into the model during the model generation process. An illustrative model training interface display screen is shown in FIG. 3. Sub-model selection is described at page 29, lines 14-15. Claim 90 is allowable because it depends from allowable claim 1.

Conclusion

The foregoing demonstrates that claims 1-3, 5-14, and 90 are in condition for allowance. This application is therefore in condition for allowance. Reconsideration and allowance of the application are respectfully requested.

Respectfully submitted,

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Date

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